

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

**COLLEGE REPUBLICANS OF THE
UNIVERSITY OF WASHINGTON;** and
CHEVY SWANSON, an Individual,

Plaintiffs,

v.

ANA MARI CAUCE, in her official capacity
as president of the University of Washington;
GERALD J. BALDASTY, in his official
capacity as provost and executive vice
president; **RENE SINGLETON**, individually
and in her official capacity as assistant director,
Student Activities; **CHRISTINA COOP**,
individually and in her official capacity as
senior activities advisor, Student Activities;
JOHN N. VINSON, individually and in his
official capacity as Chief of the University of
Washington, Seattle, Police Department;
CRAIG WILSON individually and in his
official capacity as University of Washington,
Seattle, Police Department Patrol Commander;
and DOES 1-25;

Defendants.

No. 2:18-CV-00189 MJP

PRAECIPE RE DECLARATION OF
CRAIG L. WILSON

PRAECIPE RE DECLARATION OF CRAIG L.
WILSON- 1
(Case No. 2:18-CV-00189 MJP)

PACIFICA LAW GROUP LLP
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1 TO: CLERK OF THE COURT

2 Pursuant to LCR 7(b), Defendants respectfully request the Court consider the attached
3 Declaration of Craig L. Wilson in place of the document of the same title (Dkt. 14) filed in error
4 earlier today that inadvertently omitted pages two and four from the original signed Declaration.
5

6 DATED this 8th day of February, 2018.

7 PACIFICA LAW GROUP LLP

8
9 By /s/ Jamie L. Lisagor

10 Paul J. Lawrence, WSBA # 13557

11 Jamie L. Lisagor, WSBA # 39946

12 Attorneys for Defendants
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PRAECIPE RE DECLARATION OF CRAIG L.
WILSON- 2

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of February, 2018, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

- Kyle D Netterfield knetterfield@elmlaw.com, cwyer@elmlaw.com
- William J. Becker, Jr freedomxlaw@gmail.com, Bill@freedomxlaw.com

DATED this 8th day of February, 2018.

PACIFICA LAW GROUP LLP

By /s/ Jamie L. Lisagor

Paul J. Lawrence, WSBA # 13557

Jamie L. Lisagor, WSBA # 39946

Attorneys for Defendants

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Commander; and DOES 1-25;
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No. 2:18-cv-00189

DECLARATION OF CRAIG L. WILSON

1 I, Craig L. Wilson, state as follows:

2
3 1. I am over the age of eighteen and competent to testify herein.

4 2. I am employed as an officer by the University of Washington Police Department
5 (UWPD). I am currently the Interim Deputy Chief, and served as Police Commander from April
6 2015 to January 2018. I joined UWPD in 1996 as a patrol officer, and was promoted to Sergeant
7 in 2001, to Lieutenant in 2006, and then to Commander in 2015. I have been involved with law
8 enforcement since 1993, and served in the United States Navy from 1984 to 1990.

9 3. As Interim Deputy Chief, I am second in command to the Chief. I oversee the
10 operations of the Office of Professional Accountability, Accreditation, Criminal Investigations
11 Bureau, Homeland Security, and the Training and Education Division. UWPD provides law
12 enforcement services to a daytime population of more than 70,000 students, faculty, staff, and
13 visitors, including patients at the medical center. UWPD also provides law enforcement at major
14 and special events on campus as well as private events. UWPD often works closely with local,
15 state, and federal law enforcement as well as private security companies when evaluating threats
16 and determining security needs of planned events.
17

18 4. As part of my duties, I assess security needs prior to events occurring on campus.
19 In making these assessments, I rely on my training and experience as a law enforcement officer
20 with more than 20 years of experience.
21

22 5. UWPD regularly provides security for events on campus. Events may be
23 organized by the University, various departments or schools within the University, by Registered
24 Student Organizations (RSOs), or by others who have been approved through the University's
25
26

1 policies and procedures for hosting events on campus. Since joining UWPD, I have participated
 2 in providing security at hundreds of events.

3 6. For events organized by RSOs, UWPD is forwarded information from the Student
 4 Activities Office, which is part of the Office of Special Programs. This information includes
 5 basic facts about the event, including the date, time, location, and type, and identifies whether the
 6 event is open to the public and whether alcohol will be served. UWPD takes this information,
 7 along with other information gained from the event sponsors, as the starting point for its security
 8 analysis and security planning.

10 7. In addition to the information provided by the student group, UWPD typically
 11 consults open-source websites, such as social media websites, to corroborate or clarify
 12 information about the event, particularly the expected size. Moreover, UWPD regularly consults
 13 with the Seattle Police Department, Federal Bureau of Investigation, and other local, state, and
 14 federal law enforcement agencies when gathering information used to determine potential threats
 15 and security needs.

17 8. In reviewing the security needs for any given event, a variety of factors are taken
 18 into account, including the date, time, location, anticipated size of event, whether the event is
 19 open to the public, whether past events sponsored by the same group produced security concerns.
 20 When a guest speaker is invited, UWPD also assesses whether past events of the guest speaker
 21 produced security concerns.

23 9. For the planned College Republicans Patriot Prayer event estimated security
 24 costs after considering:

- 25 • The date and time of the event (a Saturday, for three hours in the afternoon)

- The location of the planned event: “Red Square,” a central location on campus with multiple ingress and egress points with access to a variety of buildings and structures
- Whether the event is limited to the campus community (e.g. students, faculty, staff), or open to the public
- The size of the event: the College Republicans estimated the size at 100-150 attendees. UWPD also relied on other means to estimate the size of the event, including responses on social media (e.g. individuals who have indicated they are attending), as well as past experience both from UWPD staffing of events and information from Seattle Police Department colleagues.
- Information regarding events organized by the same hosts, and other actions of the sponsoring group
- Information regarding events with the same guest(s) or speaker(s)

10. Groups that host events on campus are responsible for paying the costs of reasonable event security as determined by the University according to University protocol. Typically, groups are made aware of the estimated cost before the event, then invoiced following the event.

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1 I declare under penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct to the best of my knowledge.

3
4 Dated this ____ day of February, 2018.

5 
6 CRAIG L. WILSON